

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

_____)	
ANTHONY DACRE,)	
Plaintiff)	
)	Civil Action
V.)	
)	No. 03-12269-RCL
WHITE WATER SEAFOOD CORP.,)	
Defendant)	
_____)	

PLAINTIFF'S VOIR DIRE QUESTIONS

1. Do you have convictions which might prevent or affect your rendering an impartial verdict on the issues to be decided; and, if the evidence so warrants, on the damages you award?
2. Have you heard anything or read anything that has influenced in any way your feelings about the court system, law suits for personal injuries, law suits in general or the size of jury verdicts?
3. Have you, your spouse, or any member of your family worked for an insurance company or an insurance adjusting company? If so, the name of your employer and the job you performed.
4. Do any of you have feelings that would make you prejudiced or biased against someone for bringing a law suit against a boatowner for personal injuries based on negligence and unseaworthiness of the vessel?
5. Have you, your spouse or any member of your family ever sued anyone or been sued in a law suit? If so, what was the law suit about and what was the result.
6. Have you, your spouse, or any member of your family owned your own business?
7. Have you, your spouse, or any member of your family heard anything about the

commercial fishing industry that would affect your ability to decide this case fairly?

8. Have you or your spouse ever suffered an injury in an accident that was totally or partially disabling for any significant period of time?

Respectfully submitted for the
the Plaintiff, Anthony Dacre,
by his attorney,

/s/ David J. Berg
David J. Berg, Esq.
Latti & Anderson LLP
30-31 Union Wharf
Boston, MA 02109
617-523-1000

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following: Joseph A. Regan, Esq.

/s/ David J. Berg
David J. Berg, Esq.
Latti & Anderson LLP
30-31 Union Wharf
Boston, MA 02109
617-523-1000

Dated: February 7, 2005